

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

SAVISTA, LLC,	)	CIVIL CASE NO.: 1:23-CV-06445
	)	Honorable Sara L. Ellis
Plaintiff,	)	
	)	
v.	)	<b>2<sup>ND</sup> DECLARATION OF JESSICA</b>
	)	<b>THOMPSON IN SUPPORT OF GS</b>
GS LABS, LLC,	)	<b>LABS' MOTION TO DISMISS FOR</b>
	)	<b>LACK OF PERSONAL</b>
Defendant.	)	<b>JURISDICTION</b>
	)	
	)	
	)	

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JESSICA THOMPSON, states and declares as follows:

1. I am above the age of 18, am competent to testify, and have personal knowledge of all facts set forth herein.

2. I am an employee of GS Labs, LLC ("GS Labs") and am familiar with the allegations that Savista, LLC ("Savista") has asserted against GS Labs in the above-captioned matter.

3. GS Labs tested a total of 964 insurance patients at its Warrenville, Illinois, test site. Of these patients, GS Labs hired Savista to recover 418 unpaid accounts. The only other patients who tested at the Warrenville test site were self-pay patients with whom Savista would not have had any contact.

4. In addition to Blue Cross Blue Shield ("BCBS") of Illinois, Savista was hired to recover from 441 other insurance companies nationwide.

5. These other payers that Savista would have contacted include the following BCBS entities: BCBS – Anthem; BCBS of Alabama; BCBS of Arizona; BCBS of Arkansas; BCBS of California; BCBS of District of Columbia; BCBS of Hawaii; BCBS of Kansas; BCBS of Kansas City; BCBS of Louisiana; BCBS of Maine; BCBS of Maryland; BCBS of Massachusetts; BCBS

of Minnesota; BCBS of Mississippi; BCBS of Nebraska; BCBS of New Hampshire; BCBS of New Jersey; BCBS of North Carolina; BCBS of North Dakota; BCBS of NY; BCBS of Rhode Island; BCBS of South Carolina; BCBS of Tennessee; BCBS of Vermont; BCBS of Virginia; BCBS of West Virginia; BCBS of Western New York; BCBS of Wisconsin; and BCBS of Wyoming.

6. GS Labs hired Savista to recover on at least 45,873 claims from out-of-state BCBS entities, including 14,660 from BCBS of Nebraska alone.

7. Other noteworthy insurance companies that Savista contacted to recover payments on behalf of GS Labs included: BCBS of Minnesota (58,272 claims), BCBS – Wellmark (which services the states of Iowa and South Dakota) (20,094 claims), BCBS – Premera (which services the states of Washington and Alaska) (78,342 claims), and Cambia Health Solutions (which is headquartered in Portland, Oregon) (63,026 claims).

8. Savista was hired to perform account recovery services for GS Labs nationwide, and Savista's contact with BCBS – Illinois would have comprised a small fraction of the overall account recovery services performed by Savista on behalf of GS Labs.

9. I declare under penalty of perjury that the foregoing is true and correct.

STATE OF NEBRASKA     )  
  ) ss:  
COUNTY OF DOUGLAS    )

DATED this 22<sup>nd</sup> day of December, 2023.

  
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Jessica Thompson